

FILED**MAR 27 2019**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SEOK PHENG LIM, a/k/a "Michelle," a/k/a
"Zoo"

)

) No.

)

) Violations: Title 18, United States

) Code, Section 1956(h)

)

19CR 279**JUDGE COLEMAN**

The UNITED STATES ATTORNEY charges:

MAGISTRATE JUDGE VALDEZ

Beginning no later than in or about January 2016, and continuing until at least in or about September 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEOK PHENG LIM, a/k/a "Michelle," a/k/a "Zoo,"

defendant herein, did knowingly conspire with Haiping Pan, Sui Yuet Kong, Xianbing Gan, Huanxin Long, Antonio Cuellar Esparza, and with other persons known and unknown, to commit offenses in violation of Title 18, United States Code, Section 1956, namely:

a. to knowingly conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity, namely, felony violations of Title 21, United States Code, Sections 841, 846, 952, 959, 960, and 963 involving buying, selling, importing, and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and

attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b. to transport, transmit, and transfer a monetary instrument and funds involving the proceeds of specified unlawful activity, namely, felony violations of Title 21, United States Code, Sections 841, 846, 952, 959, 960, and 963 involving buying, selling, importing, and otherwise dealing in a controlled substance, from a place in the United States to or through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i);

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

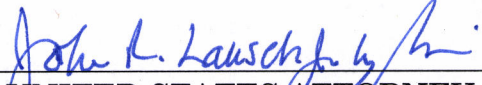
1. Upon conviction of an offense in violation of Title 18 United States Code, Sections 1956, as set forth in this Indictment, defendant shall forfeit to the United States of America any property involved in such offense, and any property traceable to such property, as provided in Title 18, United States Code, Section 982(a)(1).

2. The property to be forfeited includes, but is not limited to:

- a. a personal money judgment in the amount of approximately \$336,000.
- b. The following specific property:
 - The approximately \$492,956 in United States currency seized in Chicago on or about January 31, 2017.
 - The approximately \$117,890 in United States currency seized in Chicago on or about April 25, 2017.
 - The approximately \$504,583 in United States currency seized in New York on or about May 23, 2017.

3. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as

provided by Title 21, United States Code Section 853(p) and Title 18, United States Code, Section 982(b)(2).


UNITED STATES ATTORNEY